

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARTHA FEDORIW,

Plaintiff,

v.

CARL ZEISS VISION, INC., REED
EXHIBITION COMPANIES, MAUK
DESIGN, INC., PINNACLE EXHIBITS, INC.
and NEW YORK CONVENTION CENTER
OPERATING CORPORATION,

Defendants.

CIV. A. NO. 1:07-CV-7446 (HB)

NOTICE OF MOTION OF DEFENDANT
REED ELSEVIER, INC. FOR LEAVE TO
AMEND ITS ANSWER AND CROSS-
CLAIMS

PLEASE TAKE NOTICE that upon the Affidavit of Angelo A. Stio III, dated July 29, 2008, the exhibits annexed thereto, and the accompanying Memorandum of Law, attorneys for defendant Reed Elsevier, Inc. (improperly pled as Reed Exhibition Companies) (hereinafter "Reed") shall move this Court before the Honorable Harold Baer, Jr., United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, for an order for leave to amend its Answer and Cross-Claims pursuant to Federal Rule of Civil Procedure 15(a). Reed does not request oral argument, and under this Court's individual practices, a date and time for a hearing, if any, are not set at this time.

PURSUANT to Local Rule 6.1(b), opposition papers shall be served on or before August 12, 2008 and reply papers shall be served on or before August 19, 2008.

Dated: Princeton, New Jersey
July 29, 2008

Respectfully submitted,

/s/ Angelo A. Stio

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